

Determining Homeless Status of Youth for HUD Programs

Wednesday, October 28, 2015

2:00 - 3:30 PM ET





Panelists

- **Jasmine Hayes**, Policy Director, United States Interagency Council on Homelessness
- **Brett Gagnon**, Senior Program Specialist, Office of Special Needs Assistance Programs, United States Department of Housing & Urban Development
- **Chris Holloway**, Program Manager, Family & Youth Services Bureau, Administration for Children & Families



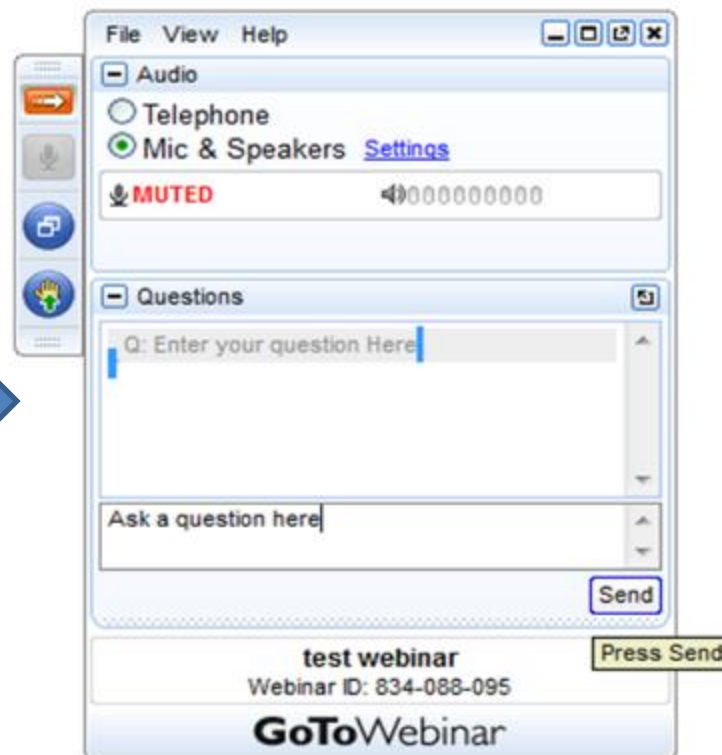
Webinar Format

- Webinar will last 90 minutes
- Approximately 30 minutes have been reserved at the end of the webinar for Q&A
- Audience members who would like to pose a question can do so at any time through the “Question” function found in the “GoToWebinar” toolbar
- Webinar attendees are muted due to the high number of participants
- Call will be recorded and then posted to usich.gov



Ask a Question

Please submit your questions via the *Questions* function found in your GoToWebinar toolbar.





Webinar Objectives

Upon completing this webinar, you will:

- Understand basic differences between HUD's and HHS/FYSB's definitions of homelessness
- Apply HUD's definition of homelessness to common living situations of youth in crisis
- Accurately implement HUD's recordkeeping requirements related to its definition of homeless
- Communicate basic eligibility requirements for HUD's Continuum of Care and Emergency Solution Grant Program



Webinar Agenda

- I. Introduction
- I. HUD's "Determining Homeless Status of Youth" Guidance
- II. Overview of the Definition of Homeless Used by FYSB
- III. Detailed Overview of the Definition of Homeless Used by HUD
- IV. Detailed Overview of the Recordkeeping Requirements Used by HUD to Establish Homeless Status and Eligibility
- V. Brief Overview of Eligibility for HUD's Homeless Assistance Programs
- VI. Q & A



Opening Doors, as amended in 2015

- Prevent and end homelessness among **Veterans** in 2015
- Finish the job of ending **chronic homelessness** in 2017
- Prevent and end homelessness for **families, youth, and children** in 2020
- Set a path to ending **all types of homelessness** in 2020





What It Means to End Homelessness

An end to homelessness does not mean that no one will ever experience a housing crisis again. Changing economic realities, the unpredictability of life and unsafe or unwelcoming family environments may create situations where individuals, families, or youth could experience or be at-risk of homelessness.

An end to homelessness means that every community will have a **systematic response** in place that ensures homelessness is prevented whenever possible or is otherwise a rare, brief, and non-recurring experience.

Preventing and Ending Youth Homelessness

A Coordinated Community Response



Federal Strategic Area

#1: Build the foundation for a coordinated and comprehensive community response

Federal Strategic Area

#2: Build the capacity of local communities to implement the components of a coordinated and comprehensive community response

Preventing and Ending Youth Homelessness A Coordinated Community Response



In Opening Doors: Federal Strategic Plan to Prevent and End Homelessness, we set a national goal to prevent and end youth homelessness in 2020. To get there, it will take all of us—government, non-profits, business, and philanthropy—to make sure every community has the capacity to achieve the goal.

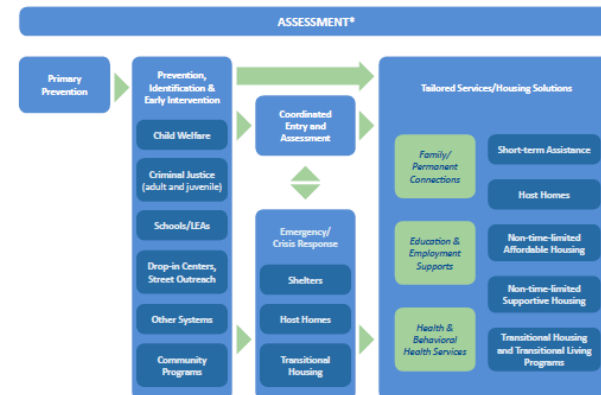
Our understanding of the scope and dynamics of youth homelessness is growing. While we continue to learn more every day, we must act now to build the comprehensive and coordinated response that young people need to end their homelessness forever.

This document provides a preliminary vision for such a response. It draws upon what we know works to end homelessness for other populations, along with strategies that support the unique needs of unaccompanied youth and young adults under 25.

We hope you'll use this document to advance discussions in your communities and build upon the work already underway. To receive additional tools and resources that will be developed to support the implementation of this response, [sign up for our newsletter](#).

Our Preliminary Vision for a Community Response

The Interagency Working Group on Ending Youth Homelessness has developed a shared vision for the community response that will be necessary to prevent and end youth homelessness, illustrated here and described in more detail below.



**Throughout the provision of services, assessment will be ongoing.*

Interagency Working Group on Ending Youth Homelessness

Co-Chairs:
U.S. Interagency Council on Homelessness
Department of Health and Human Services
Department of Housing and Urban Development

Members:
Department of Education
Department of Justice
Social Security Administration
Department of Labor

Different Federal Definitions of Youth Homelessness

- The Runaway and Homeless Youth Act
- The U.S. Department of Education
- The U.S. Department of Housing & Urban Development



Runaway and Homeless Youth Programs

- **Street Outreach Program (SOP)** - Provides street-based aid and prevention services to street youth who have been subjected to or are at risk of sexual exploitation and abuse
- **Basic Center Program (BCP)** - Addresses the immediate needs of runaway and homeless youth under age 18 by providing an array of services including prevention of youth homelessness and reunification with families (if appropriate), as well as shelter, food, medical care, and counseling.
- **Transitional Living Program & Maternity Group Homes (TLP/MGH)** - Provides longer-term residential services to homeless youth ages 16 through 21, including shelter, life skills, educational opportunities, and career counseling



HHS/FYSB's Definition of Runaway

The Runaway and Homeless Youth Act §387(a)(4)

RUNAWAY YOUTH... an individual...

who is less than 18 years of age and who absents himself or herself from home or a place of legal residence without the permission of a parent or legal guardian.



HHS/FYSB's Definition of Homeless

The Runaway and Homeless Youth Act §387(a)(3)

HOMELESS YOUTH ...an individual...

(A) who is

(i) less than 21 years of age, or, in the case of a youth seeking shelter in a center under part A (*Basic Center Program*), less than 18 years of age or is less than a higher maximum age if the State where the center is located has an applicable State or local law (including a regulation) that permits such higher maximum age in compliance with licensure requirements for child- and youth-serving facilities; and

(ii) for the purposes of part B (*Transitional Living Program*), not less than 16 years of age and either

(I) less than 22 years of age; or

(II) not less than 22 years of age, as the expiration of the maximum period of stay permitted under section 322(a)(2) if such individual commences such stay before reaching 22 years of age;

(B) for whom it is not possible to live in a safe environment with a relative; and

(C) who has no other safe alternative living arrangement.



HUD's Recently Released Guidance



This guide is intended to assist intake workers help determine and document homeless status for youth using the definition of homelessness found in the Emergency Solutions Grants (ESG) and Continuum of Care (CoC) Programs so that youth are not turned away from the housing and services that they need in error. Although the HUD definition of homelessness, except for Category 3 (families and youth defined as homeless under other federal statutes), is not specific to youth or any age group, many communities have had difficulty determining how youth meet HUD's definition of homelessness and what is required in terms of documenting homeless status. The examples in this guide are hypothetical scenarios intended to help providers understand HUD's homeless definition and what documentation is needed. While the scenarios specifically reference youth, the information may be used to determine homeless status for people of all ages seeking assistance. HUD's homeless assistance programs do not prohibit providers from providing assistance to youth who meet the criteria in HUD's definition of homelessness, whether they are unaccompanied children under 18 or youth age 18-24. However, organizations serving unaccompanied children under the age of 18 should be aware that there may be state and local laws or regulations that can affect program design or eligibility for these youth.

HUD and its federal partners recognize that, as communities build more coordinated and comprehensive responses to ending youth homelessness, they will likely need to construct a menu of appropriate services and housing options for youth that are funded through a variety of public and private, and federal, state and local agencies. HUD's homeless assistance resources should be a part of that menu but likely will not be the only resources or definitions that a community needs to consider. Nevertheless, for HUD's CoC and ESG Program funded projects, intake workers will need to verify homeless status according to HUD's definition.

Verifying homeless status is only the first step, though. A provider must also verify that a youth meets specific project eligibility criteria. Different types of ESG and CoC Program funded projects have different eligibility criteria that are defined in regulations and annual funding announcements made by HUD. Although a youth may be determined to be homeless under a particular Category of HUD's homeless definition, it does not mean that the youth is eligible for all CoC or ESG Program funded projects or that HUD funded homeless assistance projects are the most appropriate type of assistance for these homeless youth. HUD is developing additional technical assistance materials to assist providers in determining eligibility for HUD's homeless assistance projects. This guide is intended to assist providers in understanding how to determine and document homeless status according to HUD. However, in order to effectively match homeless youth to the appropriate resources, each local homeless housing and service project must provide the CoC with their detailed eligibility criteria.

YOUTH HOUSING CRISIS SCENARIOS

ALEXIS Alexis, 23, had been living with her boyfriend but they broke-up and she could not afford her own place and had no other friends or family willing to let her stay with them. A friend's father offered her a room in his house in exchange for sex and Alexis moved in since she had nowhere else to stay and could not afford her own apartment. Alexis doesn't want to stay there anymore but she has nowhere else to stay, little money, and is afraid she will have to sleep under a bridge if she moves out.

Is Alexis homeless according to HUD's definition? Yes, under Category 4. She has been trading sex for a place to stay and she will lose the place if she refuses to have sex with her friend's father. She has no other housing options or resources to secure her own housing. On the other hand, she wasn't homeless when she was with her boyfriend because he wasn't requiring her to have sex with him to stay at his place and she felt safe.



- HUD released, “Determining Homeless Status of Youth” in October, 2015
- The purpose is to assist intake workers determine and document homeless status for youth using HUD's Definition of Homeless
- The resource uses hypothetical scenarios



HUD's Definition of Homeless

HUD's Definition of Homeless has **4** Categories:

1. Literally Homeless Individuals/Families
2. Individuals/Families who will *imminently* lose their primary nighttime residence
3. Unaccompanied youth and families with children and youth who are homeless under another Federal statute
4. Individuals/Families fleeing or attempting to flee domestic violence



HUD's Definition of Homeless - Category 1

An individual or family who lacks a fixed, regular, and adequate nighttime residence, meaning:

- Sleeping in a place not designed for or ordinarily used as a regular sleeping accommodation, including:
 - A car
 - A park
 - An abandoned building
 - A bus or train station
 - An airport
 - A camping ground



HUD's Definition of Homeless - Category 1

An individual or family who lacks a fixed, regular, and adequate nighttime residence, meaning (cont.):

- Living in a shelter designed to provide temporary living arrangements, including:
 - Emergency shelters
 - Transitional Housing
 - Hotels and motels paid for by charitable organizations or federal/state/local government programs



HUD's Definition of Homeless - Category 1

An individual who lacks a fixed, regular, and adequate nighttime residence, meaning (cont.):

- Exiting an institution (e.g., jail, hospital)
 - Where (s)he resided for 90 days or less AND
 - Were residing in an emergency shelter or place not meant for human habitation immediately before entering institution



HUD's Definition of Homeless - Category 2

Individuals and families who will imminently lose (within 14 days) their primary nighttime residence who also:

- Have no subsequent residence identified, AND
- Lack the resources or support networks needed to obtain other permanent housing



HUD's Definition of Homeless - Category 4

Individuals and families that are fleeing or attempting to flee domestic violence, dating violence, sexual assault, stalking, or other dangerous or life threatening conditions (survival sex, human trafficking) that relate to violence that make the individual or family afraid to return to their primary nighttime residence, who also:

- Have no subsequent residence identified, AND
- Lack the resources or support networks needed to obtain other permanent housing



HUD's Definition of Homeless - Category 3

Unaccompanied youth (under 25) or families with children and youth who do not otherwise qualify as homeless under HUD's definition, but who:

- Meet the definition of homeless under another Federal Statute, and
- Have not had a lease, ownership interest, or occupancy agreement in permanent housing in the last 60 days, and
- Have experienced two or more moves in the last 60 days, and
- Can be expected to continue in such status for an extended period of time because of special needs or two or more barriers to employment



HUD's Definition of Homeless - Case Studies

- Alexis
- David
- Jordan



Documenting Homeless Status for HUD: HUD's Preferred Order

1. Third Party
 - Written, including HMIS and other already available documents
 - Oral
2. Intake Staff Observations
3. Self-Certification

Lack of third party documentation should NOT prevent a youth from accessing emergency, life saving, shelter and services



Documenting Homeless Status for HUD

1. Intake workers are responsible for obtaining the evidence of homeless status
2. An intake worker should NOT contact anyone for documentation that the youth feels would jeopardize his or her health or safety
3. Self-certification from the youth that (s)he meets the criteria of a category can be accepted in most instances
4. When documenting homeless status using Category 4, the intake worker needs to ask only enough questions to understand what is happening



Eligibility for HUD Programs

- **Eligibility for the Emergency Solution Grant (ESG) Program is determined by:**
 - The [ESG Program regulation](#)
 - The ESG recipient's, or sub-recipients', written standards for prioritizing assistance

- [The Homeless Definition and Eligibility for Supportive Housing Program \(SHP\), Shelter Plus Care \(SPC\), and ESG](#) provides eligibility for the ESG Program according to the ESG Program interim rule



Eligibility for HUD Programs

Eligibility for the Continuum of Care (CoC) Program is determined by:

- The [CoC Program regulation](#)
- The FY CoC Program Competition Notice of Funding Availability (NOFA) under which the project was funded
- The CoC's written standards for prioritizing assistance



Eligibility for HUD Programs

Here are some questions to consider to help you determine whether a youth might be eligible for a CoC- or ESG-Program funded project:

1. What Category of homelessness did the youth qualify under?
2. Which program is the project funded under?
3. What type of assistance (e.g., ES, TH, PSH) does the project provide?
4. Are there any additional eligibility limitations for the type of assistance from:
 - The regulation?
 - The local written standards?
 - The CoC Program NOFA?
 - The project?



Other Resources

- [USICH's Opening Doors: Federal Strategic Plan to Prevent and End Homelessness](#)
- [USICH's Preventing and Ending Youth Homelessness: A Coordinated Community Response](#)
- [HUD's One Stop Spot for Resources for Homeless Youth](#)
- [HUD's Homeless Definition as it Relates to Children and Youth](#)
- [Criteria and Recordkeeping Requirements for Definition of Homelessness](#)
- [Homeless Status: Recordkeeping Requirements Webinar](#)
- [Determining Homeless and At-Risk Status, Income, and Disability Webinar](#)
- [HHS/FYSB's Definition of Runaway Under RHYA \(2008\)](#)



Questions?

- Review Questions that have been submitted through the chat function
- The webinar will be available on our website at <http://www.usich.gov>
- USICH will send an e-blast letting you know when it's posted



Stay Connected



Subscribe to our newsletter: usich.gov/signup



facebook.com/USICH



twitter.com/USICHgov



www.usich.gov